



**FILED**

03-30-07

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework  
and to Examine the Integration of Greenhouse Gas  
Emissions Standards into Procurement Policies.

Rulemaking R.06-04-009

**REQUEST FOR AN AWARD OF COMPENSATION TO  
THE GREEN POWER INSTITUTE  
FOR SUBSTANTIAL CONTRIBUTIONS TO D.07-01-039**

March 30, 2007

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**REQUEST FOR AN AWARD OF COMPENSATION TO  
THE GREEN POWER INSTITUTE  
FOR SUBSTANTIAL CONTRIBUTIONS TO D.07-01-039**

Pursuant to §1801 et seq. of the Public Utilities (PU) Code and Rule 76.71 et seq. of the Commission's Rules of Practice and Procedure, the Green Power Institute (GPI) submits this request for an award of compensation in the amount of \$50,627 for our substantial contributions to Commission Decision D.07-01-039, *Interim Opinion on Phase I Issues: Greenhouse Gas Emissions Performance Standard*, in Rulemaking R.06-04-009, the ***Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies***.

Consistent with the requirements of PU Code §1804(c), this request is being filed within 60 days of January 29, 2007, the date of issuance (mailing) of D.07-01-039. Section 1804(c) further requires that a compensation request include a detailed description of services and expenditures and a description of the customer's substantial contribution to the hearing or proceeding. In the following sections, GPI satisfies these requirements.

**Introduction**

On June 9, 2006, the Green Power Institute (GPI) timely filed a *Notice of Intent to Claim Compensation* in R.06-04-009. On March 20, 2007, the GPI filed an *Amended Notice of Intent to Claim Compensation*. The GPI was found to be eligible to claim compensation in this Proceeding in the July 10, 2006, *Administrative Law Judge's Ruling Granting Notices of Intent to Claim Compensation*. Our circumstances with respect to eligibility have not changed.

As specified in § 1802 (b) of the Public Utility Code, the GPI has been participating in this proceeding as a Category 3 customer, a “representative of a group or organization

authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers” of California’s three major investor owned utilities.

Decision D.07-01-039 completed the scope of effort for the first phase of R.06-04-009, and implements an interim greenhouse gas emissions performance standard (EPS) in accordance with SB 1368 and the Commission’s overall policies with respect to limiting greenhouse gas emissions. The GPI participated in workshops and meetings, and produced a series of filings on the development of the interim EPS, in the R.06-04-009 docket, in support of D.07-01-039.

### **Substantial Contribution**

Section 1803(a) of the Public Utilities Code requires that a customer make a substantial contribution to a commission decision in order to qualify to receive intervenor compensation. Section 1802 (i) defines substantial contribution as:

*“Substantial contribution” means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer’s participation has resulted in a substantial contribution, even if the decision adopts that customer’s contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate’s fees, reasonable expert fees, and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.*

The commission has elaborated on this statutory standard as follows:

*A party may make a substantial contribution to a decision in various ways. It may offer a factual or legal contention upon which the Commission relied in making a decision. Or it may advance a specific policy or procedural recommendation that the ALJ or Commission adopted. A substantial contribution includes evidence or argument that supports part of the decision, even if the Commission does not adopt a party’s position in total. The Commission has provided compensation even when the position advanced by the intervenor is rejected (D.99-08-006).*

## Documentation of the GPI's Substantial Contributions

The GPI made substantial contributions to Decision D.07-01-039 in the areas of making the EPS a gateway standard, definition of covered resources, emissions level, emission rates for renewables and null power, and exemptions to the EPS. Table 1 (below) lists the GPI's filings relevant to the Decision covered by this *Request for Compensation*.

**Table 1**  
**Filings Relevant to Decision D.07-01-039**

5/5/06	Prehearing Conference Statement of the Green Power Institute
6/12/06	Pre-Workshop Comments of the Green Power Institute on Phase I Issues
7/11/06	Reply Brief of the Green Power Institute on Jurisdictional Issues
7/27/06	Post-Workshop Comments of the Green Power Institute on an Interim Emissions Performance Standard
9/8/06	Comments of the Green Power Institute on the Draft Workshop Report
9/15/06	Reply Comments of the Green Power Institute on the Draft Workshop Report
10/18/06	Comments of the Green Power Institute on the Final Workshop Report
10/27/06	Reply Comments of the Green Power Institute on the Final Workshop Report
12/27/06	Comments of the Green Power Institute on the Proposed Decision of Commissioner Peevey and ALJ Gottstein
1/8/07	Reply Comments of the Green Power Institute on the Proposed Decision of Commissioner Peevey and ALJ Gottstein

### ***Gateway Standard***

One of the first threshold questions that had to be addressed in crafting the Commission's interim EPS was whether to make it a pass-fail standard, or a standard that requires on-going compliance and enforcement. From the start, the GPI strongly supported making the EPS a pass-fail standard to be enacted quickly, in anticipation of the more lengthy

process of enacting the Commission's desired long-term, load-based cap program. On page 6 of our June 12, 2006, *Prehearing Conference Statement*, the GPI introduced the concept of a "gateway" EPS into the proceeding: "We believe that the interim EPS should be a gatekeeper-type of standard that is applied to proposed new utility procurements." The Commission established the interim EPS as a gateway standard.

### ***Definition of Covered Resources***

The July 6, 2006, Division of Strategic Planning memo states that the interim EPS is intended "to cover baseload, high-use intermediate, and shaping facilities." The staff straw proposal that was developed during the June workshops adopted a minimum capacity factor for covered resources of 60 percent. In our July 27, 2006, *Post Workshop Comments*, we pointed out that a 60 percent capacity factor, which is an appropriate threshold for baseload generators, is too high to use if high-use intermediate and shaping facilities were also to be included as covered resources. SB 1368, which was signed into law in September 2006, called for an EPS that covered baseload resources, and set the capacity factor threshold at 60 percent. Most parties favored adopting the 60 percent threshold in deference to SB 1368, but the GPI, in *Comments* on both the draft and final workshop reports, encouraged the Commission to go beyond the minimal requirements of the new legislation, and enact an EPS that covered high-use intermediate and shaping facilities in addition to baseload, in accordance with its original intention. The Commission declined, but acknowledged our contribution to its deliberations:

In their comments, Green Power Institute (GPI) recommends that the Commission adopt a 50% capacity factor threshold in order to include high-use intermediate and shaping facilities in the definition of covered procurements. We prefer not to go beyond what the Legislature intended and, therefore, the interim EPS will apply to baseload generation that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent. [Decision D.07-01-039, pages 39 – 40.]

### ***Setting the Emissions Level***

The Commission's intention, reinforced by SB 1368, was to base the Emissions Performance Standard on the emissions rate of a combined-cycle gas turbine (CCGT) generator. While that sounds simple in concept, actually setting the numerical emission

rate turned out to be a very contentious issue. Staff's original inclination was to set two different levels, one to apply to procurements from new generating facilities, and one for procurements from existing facilities. From the start, the GPI took the position that the essential purpose of the EPS was to avoid technologies with emissions rates clearly higher than a CCGT, not to differentiate among CCGTs. Given the gap between the worst CCGT and the best non-CCGT baseload alternative, which we illustrated graphically in our July 27, 2007, *Post Workshop Comments*, we recommended setting a single standard flexible enough to accommodate a broad range of CCGT configurations and operating conditions:

We recommend setting the EPS at a level of 1,100 – 1,200 lbs/MWh, and applying this single standard to all proposed covered long-term procurements, regardless of whether the energy will be coming from existing facilities, or from facilities still in the preliminary planning stage. As participants at the June workshops pointed out, a variety of factors can affect the expected emissions factor for a given generator, including the choice of cooling technology, average ambient temperature, presence or absence of duct-burning, and duty cycle anticipated for the generator (load following leads to elevated heat rates compared to operations at constant load). An EPS in the range of 1,100 – 1,200 lbs/MWh allows the procurement of a wide variety of CCGTs, while preventing the procurement of virtually any other type of generator covered by the standard. [*GPI Post-Workshop Comments*, July 27, 2006, page 12.]

Commission staff quickly decided on the use of a single standard to be applied to all proposed procurements, but agonized over the value at which to set the standard. In the *Draft Workshop Report* the staff adopted a value of 1,000 lbs/MWh. In our *Comments*, we argued for a higher level:

We are pleased to see that the *Draft Workshop Report* adopts a single numerical standard for the interim EPS for all proposed procurements, whether based on new, repowered, or existing generating equipment. We are concerned, however, that the numerical standard that is selected is unnecessarily tight. The proposed value of 1,000 lb/MWh could exclude some legitimate CCGT generating facilities. In our opinion, this is not the purpose of the standard. [*Comments on the Draft Workshop Report*, Sept. 8, 2006, pg. 6.]

The *Final Workshop Report* adopted an EPS of 1,100 lb/MWh. The *Proposed Decision* brought the level back down to 1,100 lb/MWh. The *Final Decision* reversed again and returned to 1,100 lb/MWh, the level originally recommended by the GPI. The reasoning in the final Decision was strongly influenced by the GPI's arguments:

We conclude from the data and considerations described above, that establishing an EPS standard for CO<sub>2</sub> emissions of 1,100 lbs /MWh is reasonable. It represents a level that reflects emission rates associated with both existing and new baseload CCGT units and reasonably accounts for potential CCGT plant “outliers” from the average CEMS that utilize dry cooling technologies, are smaller-sized facilities or are located in the desert or at high altitudes. [Decision D.07-01-039, page 70.]

### ***Treatment of Renewables and Null Energy***

The GPI made major contributions to Decision D.07-01-039 in establishing a record that provided the basis for the Commission to grant an automatic pass through the EPS gateway to most renewable generating resources. We placed important research reports into the record of the proceeding that document the low greenhouse gas emissions of renewables, and wrote extensively about the subject in our July 27, 2006, *Post-Workshop Comments* (see pages 13 – 18), repeated and restated in our October 18, 2006, *Comments on the Final Workshop Report* (see pages 3 – 10). Many parties supported our approach (Decision 07-01-039, page 116):

NRDC, TURN, UCS, WRA, SDG&E, SoCalGas, and PG&E point to the extensive analysis presented by GPI in its Phase 1 comments that, in their view, supports the following findings:

- 1) Many renewable generating sources operate without producing any GHG emissions at all, or levels of emissions much lower than the best available CCGT. This group of renewables includes geothermal, solar and wind.
- 2) Even without re-injection, the highest GHG emitting geothermal generators emit less than 100 lb (CO<sub>2</sub> equivalent/MWh, which is a fraction of the GHGs emitted by the most efficient CCGTs,
- 3) Solar thermal generators with full gas assist (up to 25 percent gas heat input) produce approximately 375 (CO<sub>2</sub> equiv) lb/MWh, still less than half the amount emitted by the most efficient CCGTs, and
- 4) When net emissions are accounted for, as required under SB 1368, generating electricity from biomass, biogas or landfill gas energy actually *reduces* the net GHG emissions associated with the disposal of society’s waste and residue materials.

The Commission’s Final Workshop Report specified that renewables were subject to the EPS, and would have to demonstrate their compliance at the time of contract approval. The Proposed and Final Decisions embrace the GPI’s input, incorporate our data

(Attachement 6 to the Decision) and figure (Decision, Figure 1), and grant renewables an automatic pass to the EPS:

For the reasons stated above, we find that the approach for finding renewables compliant with the EPS recommended by GPI, NRDC and others is both consistent with the language and intent of SB 1368, as well as reasonable in light of overall cost considerations (Decision D.07-01-039, page 118).

The GPI also endorsed granting an automatic pass to contracts for null renewable energy from generating sources that split and sell their RECs separately from their energy. As we stated on page 7 of our September 8, 2006, *Comments on the Draft Workshop Report*:

In fact, the validity of RECs and REC markets is in no way compromised by treating null energy as free of greenhouse gas emissions for the limited purpose of application of the interim EPS, as we recommended in our July 27, 2006, Post-Workshop Comments. The bearer of the REC continues to possess the REC and its embodied attributes, and can use it to count towards an RPS-type program obligation or product claim. The party that procures the null energy will not be able to count that energy as renewable, or otherwise derive any benefit of the renewableness of the energy. The only question regarding null energy that needs to be addressed here, in enacting an interim EPS, is how to treat null energy with respect to the gateway EPS standard. Null energy is produced from generating sources with greenhouse gas emissions much lower than the proposed EPS. On that basis, it should automatically pass the EPS, and thereby enable the production of the unbundled RECs.

The Proposed and Final Decisions embraced the GPI's arguments that null power should be given an automatic pass through the EPS:

For all the reasons stated above, in applying the interim EPS we adopt today, the emissions of a renewable facility will not change if or when it sells RECs under a future regulatory REC market. Nor will RECs count towards compliance with the interim EPS by those LSEs who may purchase them for RPS compliance purposes in the future. [Decision D.07-01-039, pg. 127.]

### ***EPS Exemptions***

Following the June workshops in this proceeding, the Division of Strategic Planning published a memo requesting post-workshop comments. One of the questions asked in the memo was whether an R&D exclusion should be included in the EPS. We opposed an R&D exclusion from the start, arguing:



The DSP memo asks whether and how the EPS should incorporate a research and development exemption for advanced coal or other technologies. We are not sure we understand what such an exemption would entail. Presumably, a coal-fired R&D project that involved carbon sequestration would be able to pass the standard without an exemption, as long as it involves the sequestration of at least fifty percent of the CO<sub>2</sub> that is generated. We are opposed to allowing an exemption for advanced coal technologies that merely provide a better platform for possible future sequestration, rather than actually providing for sequestration, in the initial design. Otherwise, a giant loophole is created, and the standard would be rendered meaningless. [*Post-Workshop Comments*, July 27, 2006, pages 8 – 9.]

In an attempt to accommodate all parties, both the *Draft* and *Final Workshop Reports* attempted to include an R&D exclusion. We argued strenuously against it, warning that allowing coal IGCC an exclusion on the basis that it might one day facilitate the development of sequestration technology would gut the EPS. For example:

Item 6 b) can be interpreted to mean that all coal-fired IGCC power plants are exempt from the interim EPS, regardless of whether they ever undertake actual carbon sequestration operations. In other words, item 6 b) of the *Final Staff Proposal* effectively converts the interim EPS from a standard based on the emissions of a natural gas-fired CCGT, to a standard based on the emissions of a coal-fired IGCC. This is clearly contrary to both the spirit and letter of SB 1368, which does not even mention an R&D exemption. We are strongly opposed to allowing an exemption for advanced coal power plants that merely provide a better **platform** for possible future sequestration, rather than actually **practicing** sequestration. [*Comments on the Final Workshop Report*, October 18, 2006, page 10.]

In accordance with the GPI's arguments, Decision D.07-01-039 does not provide for an R&D exclusion, but does allow projects that include actual sequestration operations to be approved if they meet the EPS standard after sequestered carbon has been subtracted from boiler emissions.

### ***Additional Substantial Contributions***

The GPI made a variety of additional substantial contributions to Decision D.07-01-039. For example, we were early and consistent supporters of the concept that the EPS should apply to the underlying facility for proposed procurements that involved partial procurements from identified generating facilities, and to the highest-emitting resource for procurements from multiple, or unspecified, sources. We also offered extensive comments on firming contracts for intermittent renewables, originally opposing PG&E's open-ended proposal on firming, but later supporting their much more limited, and appropriate

proposal, which was adopted in the Decision. We supported applying the EPS to renewal contracts, and opposed the utilities' interpretation of retained baseload generation with new investment. We also contributed to determinations about the size exemption, minimum contract term, and cost-based exemptions. On the later, the Decision states (pages 103 – 104): “As GPI and others point out, in this context no single procurement can be said to cause significant cost or economic impacts, in and of itself, for a utility's customers.”

### **Avoided Duplication, Benefits of Participation**

In D.98-04-059, the Commission adopted a requirement that a customer must demonstrate that its participation was “productive,” as that term is used in §1801.3. The Commission directed customers to demonstrate productivity by assigning a reasonable dollar value to the benefits of their participation to ratepayers. The Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with the participation of consumer and environmental intervenors.

The GPI coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations on formulating the interim EPS. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but the GPI avoided duplication to the extent possible, and tried to minimize it where it was unavoidable. The GPI took the lead on characterizing the greenhouse gas emissions from renewables, and worked closely with other environmental groups on many of the issues in the proceeding.

In this docket, the GPI has provided valuable information and insights about many aspects of the Commission's deliberations into constructing an interim EPS. The Decision in this rulemaking does not offer the GPI the opportunity to demonstrate specific monetary benefits to residential customers. However, the enactment of the Commission's interim EPS is premised, in part, on the assumption of reducing future costs of compliance with greenhouse gas standards. In addition, some of the most important benefits of the interim

EPS program are in the areas of environmental and health improvements, and these benefits will only arise should the rules and procedures adopted in this proceeding actually lead to the achievement of the state's greenhouse gas reduction goals.

Even in the absence of explicitly defined financial benefits, the Commission has previously recognized the overall benefit of the participation of consumer and environmental intervenors where that participation assisted the Commission in developing a record on which to assess the reasonableness of the utility's operations, and particularly its preparedness and performance in the future. Under the circumstances described above, the Commission should find that the GPI's participation in this Decision meets the productivity requirement.

### **Itemization of Services and Expenditures**

In this filing the GPI is requesting compensation for all of the time that we reasonably devoted to this Proceeding directly in support of Decision D.07-01-039, as well as the direct filing expenses we incurred in the course of our participation. The following is a summary of the GPI's requested compensation. A more detailed breakdown of the time devoted to this proceeding is provided in Attachment A to this filing, which also contains an itemization of expenses.

GPI Staff Time 2006	\$ 48,698
GPI Comp Request Prep Time	\$ 1,540
Document Filing and Serving	\$ <u>389</u>
Total Compensation Request	\$ 50,627

### **The Hours and Rates are Reasonable and Documented**

The GPI is providing, in Attachment A, a detailed breakdown of GPI staff time spent on this Proceeding, R.06-04-009, for work performed that was directly related to our substantial contributions to Decision D.07-01-039.

The hours claimed herein in support of D.07-01-039 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. Dr. Morris acted in this Proceeding as both witness and participating party. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to this case. In preparing Attachment A, Dr. Morris reviewed all of the recorded hours devoted to this proceeding and included only those that were reasonable for the underlying task. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.

In Decision D06-08-013, the CPUC approved an hourly rate for GPI Director Dr. Gregory Morris of \$220 /hour for 2006. This request includes 8.5 hours of effort in early 2007 in support of the Decision, which was enacted in late January. In view of the fact that virtually all of the substantive work covered by this Request was expended in 2006, we are charging these early 2007 hours at the 2006 rate. We reserve the right to make the case for higher GPI rates for 2007 work in a future Request that covers work substantially performed in 2007, should we deem it appropriate to do so, consistent with Commission policies and Decisions.

Decision D.06-10-012 sets a 2005 rate of \$30 /hour for GPI research associates. Adopting the logic used in D.06-08-013, three percent inflation from 2005 rates, we propose a rate of \$31 /hour for 2006 for the two GPI Research Associates, Valerie Morris and Zoë Harrold, who participated in this case. We have made the same proposal in two previous *Requests for Award* (Dec. 20, 2006, in R.06-05-027, and March 19, 2007, in R.06-03-004). We use these rates in this *Request for Award*.

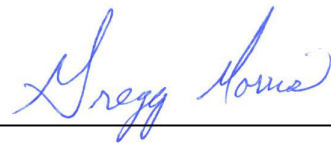
In Attachment A, we show a detailed breakdown of the hours covered by this *Request for Award*. Hours claimed in March, 2007, were devoted to the preparation of this *Request*, and are charged at 50 percent of the full charge rate, in conformance with the Commission's *Rules of Practice and Procedure*.

Dr. Morris is a renewable energy analyst and consultant with twenty-five years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California.

Dr. Morris has been actively involved in electric utility restructuring in California throughout the past decade. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996, consultant to the CEC Renewables Program Committee, consultant to the Governor's Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.

The GPI made significant contributions to Decision D.07-01-039 by providing a series of Commission filings on the topic of development of an interim RPS, in R.06-04-009. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety.

Dated March 30, 2007, at Berkeley, California.  
Respectfully Submitted,



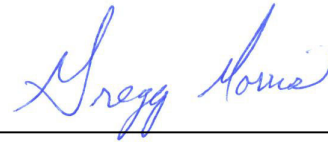
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### VERIFICATION

I, Gregory Morris, am Director of the Green Power Institute, and a Research Affiliate of the Pacific Institute for Studies in Development, Environment, and Security. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Request for an Award of Compensation to the Green Power Institute for Substantial Contributions to D.07-01-039*, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on March 30, 2007, at Berkeley, California.

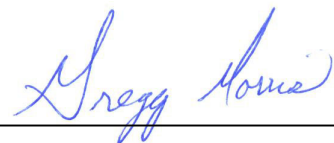


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Gregory Morris

PROOF OF SERVICE

I hereby certify that on March 30, 2007, I have served a copy of REQUEST FOR AN AWARD OF COMPENSATION TO THE GREEN POWER INSTITUTE FOR SUBSTANTIAL CONTRIBUTIONS TO D.07-01-039, upon all parties listed on the Service List for this proceeding, R-06-04-009. All parties have been served by email or first class mail, in accordance with Commission Rules.

A handwritten signature in blue ink, appearing to read "Gregory Morris", is written over a horizontal line.

Gregory Morris

## Attachment A

### GPI Compensation Request, D.07-01-039, Mar. 2007

Rates (\$/hr)

2006

Gregg Morris	220.00
Research Associate	31.00

	Res. Associates		Gregg Morris, GPI Director			
	<u>V. Morris</u>	<u>Z. Harold</u>	<u>PHC</u>	<u>Comments</u>	<u>Wkshps/Mtgs</u>	<u>Emissions</u>
Hours						
<u>2006</u>						
May			11.0	1.5		
June		10.5		12.0	27.5	5.5
July		12.5		48.0	7.0	
August		7.5		6.5	5.5	
September	5.0	2.5		22.0	6.0	
October				31.0	4.5	
November						10.5
December				9.0		

2007

January	6.0
February	2.5

Total Hrs Morris	216.0
Amount \$s	47,520

Total Hrs RAs	38.0
Amount \$s	1,178

Comp Req Hrs March 2007	14.0
Amount \$s	1,540

	<u>Amount \$s</u>
GPI Staff Time 2006	48,698
GPI Request Prep (@ 50% 2006 rates)	1,540

Filings, Misc.	389
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Total	50,627
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### Detail on Professional Hours for GPI Director Dr. Morris

#### May 2006

5/3/6	Review of Scoping Memo, plan PHC statement	2 hrs
5/4/6	Work on PHC statement, phase 1	1 hrs



5/5/6	Work on PHC statement, phase 1	5 hrs
5/10/6	Attend Pre Hearing Conference	3 hrs
5/24/6	Review documents, call with Zoë re documents	1 hrs
5/30/6	Review documents, call with Zoë re documents	½ hrs

### **June 2006**

6/8/6	Review of workshop documents, begin pre-workshop comments	3½ hrs
6/9/6	Work on pre-workshop comments	2½ hrs
6/11/6	Work on pre-workshop comments	3 hrs
6/12/6	Complete, file and serve pre-workshop comments	1 hrs
6/13/6	Receive and review other parties' pre-workshop comments	1 hrs
6/19/6	Preparation for workshops, review of utility data answers	1 hrs
6/20/6	Preparation for workshops, review of utility data answers	3½ hrs
6/21/6	Attend PUC workshop, ghg EPS, Hiram Johnson dungeon	8 hrs
6/22/6	Attend PUC workshop, ghg EPS, Hiram Johnson dungeon	8 hrs
6/23/6	Attend PUC workshop, ghg EPS, Hiram Johnson dungeon	7 hrs
6/26/6	Planning of post-workshop documents	1 hrs
6/29/6	Emissions analysis, gas vs. coal	2½ hrs
6/30/6	Emissions analysis, gas vs. coal, other technologies	3 hrs

### **July 2006**

7/7/6	Work on reply brief on jurisdictional issues	4 hrs
7/10/6	Work on reply brief on jurisdictional issues	3½ hrs
7/11/6	Complete, file and serve reply brief, emissions analysis	1½ hrs
7/13/6	Planning of post-workshop comments	1½ hrs
7/14/6	Work on post-workshop comments	3 hrs
7/17/6	Work on post-workshop comments	5 hrs
7/18/6	Work on post-workshop comments	3½ hrs
7/19/6	Work on post-workshop comments	2½ hrs
7/21/6	Meeting at PG&E, work on post-workshop comments	7 hrs
7/22/6	Work on post-workshop comments	2½ hrs
7/24/6	Work on post-workshop comments	3 hrs
7/25/6	Work on post-workshop comments	6½ hrs
7/26/6	Work on post-workshop comments	6½ hrs
7/27/6	Complete, file and serve post-workshop comments	5 hrs

### **August 2006**

8/3/6	Work on post settlement agreements	½ hrs
8/21/6	Settlement talks with interested parties, PG&E	5 hrs
8/23/6	Review of staff workshop report	2½ hrs
8/24/6	Plan comments on workshop report	1 hrs
8/31/6	Work on comments on workshop report	3 hrs

**September 2006**

9/1/6	Work on post settlement agreements	6 hrs
9/6/6	Work on comments on draft workshop report	1½ hrs
9/7/6	Work on comments on draft workshop report	3 hrs
9/8/6	Complete, file and serve comments on draft workshop report	5½ hrs
9/12/6	Review other parties' comments, begin reply comments	3½ hrs
9/13/6	Work on reply comments on draft workshop report	5 hrs
9/15/6	Complete, file and serve reply comments on draft workshop report	3 hrs
9/19/6	Review other parties' reply comments	½ hrs

**October 2006**

10/3/6	Review of revised workshop report	1 hrs
10/4/6	Attend settlement conference at PG&E	4½ hrs
10/14/6	Work on comments on final workshop report	1½ hrs
10/16/6	Work on comments on final workshop report	7½ hrs
10/17/6	Work on comments on final workshop report	5 hrs
10/18/6	Complete, file and serve comments on final workshop report	3½ hrs
10/20/6	Review other parties' comments, begin reply comments	2 hrs
10/24/6	Work on reply comments on final workshop report	5 hrs
10/25/6	Work on reply comments on final workshop report	2 hrs
10/26/6	Work on reply comments on final workshop report	½ hrs
10/27/6	Complete, file and serve reply comments on final workshop report	2 hrs
10/30/6	Review other parties' reply comments	½ hrs
10/31/6	Review other parties' reply comments	½ hrs

**November 2006**

11/2/6	Data analysis of ghg emissions in connection with request from ALJ	2½ hrs
11/3/6	Data analysis of ghg emissions in connection with request from ALJ	3½ hrs
11/6/6	Data analysis of ghg emissions in connection with request from ALJ	2 hrs
11/16/6	Data analysis of ghg emissions in connection with request from ALJ	1½ hrs
11/21/6	Data analysis of ghg emissions in connection with request from ALJ	1 hrs

**December 2006**

12/18/6	Review of proposed decision, begin comments	1½ hrs
12/22/6	Work on comments on the proposed decision	1½ hrs
12/23/6	Work on comments on the proposed decision	4 hrs
12/27/6	Complete, file and serve comments on the proposed decision	2 hrs

**January 2007**

1/7/7	Review of comments on proposed decision, begin reply comments	2 hrs
1/8/7	Complete, file and serve reply comments on PD	4 hrs

**February 2007**

2/2/7	Review Phase I Decision: interim EPS	2½ hrs
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**March 2007**

3/20/7	Preparation of Request for Award of Compensation	1½ hrs
3/22/7	Preparation of Request for Award of Compensation	1 hrs
3/23/7	Preparation of Request for Award of Compensation	2½ hrs
3/25/7	Preparation of Request for Award of Compensation	3 hrs
3/27/7	Preparation of Request for Award of Compensation	6 hrs

**Detail on Professional Hours for GPI Associate Zoë Harrold****June 2006**

6/4/6	Review of workshop documents	1½ hrs
6/5/6	Review of workshop documents	1½ hrs
6/9/6	Review and analysis of workshop documents	2 hrs
6/10/6	Review and analysis of workshop documents	1½ hrs
6/20/6	Review and analysis of workshop documents	4 hrs

**July 2006**

7/5/6	Review and analysis of emissions data	4 hrs
7/6/6	Review and analysis of emissions data	1½ hrs
7/13/6	Review of staff workshop report	2 hrs
7/15/6	Review and analysis of staff workshop report	2 hrs
7/19/6	Review and analysis of staff workshop report	2 hrs
7/30/6	Review of parties' post-workshop comments	1 hrs

**August 2006**

8/2/6	Review of parties' post-workshop comments	1 hrs
8/3/6	Review of parties' post-workshop comments	1 hrs
8/4/6	Review of parties' post-workshop comments	1½ hrs
8/5/6	Review of parties' post-workshop comments	4 hrs

**September 2006**

9/1/6	Review of workshop report	1½ hrs
9/14/6	Review of parties' comments on workshop report	1 hrs

**Detail on Professional Hours for GPI Associate Valerie Morris****September 2006**

9/12/6	Review of parties' comments on workshop report	2 hrs
9/13/6	Review of parties' comments on workshop report	3 hrs

## Filings Relevant to Decision D.07-01-039

5/5/06	PHC Statement	
	IDS Courier	35.00
	Copy Central	5.48
	Postage and mailing	14.82
6/12/06	Pre-Workshop Comments, Phase I Issues	
	IDS Courier	25.00
	Postage and mailing	3.45
7/11/06	Reply Brief on Jurisdictional Issues	
	Federal Express	16.24
	Copy Central	4.90
	Postage and mailing	2.73
7/27/06	Post-Workshop Comments on an Interim EPS	
	IDS Courier	35.00
	Copy Central	15.40
	Postage and mailing	9.39
9/8/06	Comments on the Draft Workshop Report	
	IDS Courier	35.00
	Copy Central	7.07
	Postage and mailing	3.45
9/15/06	Reply Comments on the Draft Workshop Report	
	IDS Courier	22.50
	Postage and mailing	2.76
10/18/06	Comments on the Final Workshop Report	
	IDS Courier	35.00
	Copy Central	43.35
10/27/06	Reply Comments on the Final Workshop Report	
	IDS Courier	22.50
	Postage and mailing	4.47
12/27/06	Comments on the Proposed Decision	
	Postage and mailing	7.56
1/8/07	Reply Comments on the Proposed Decision	
	IDS Courier	36.00
	Postage and mailing	1.56
	<b>Total costs of filings</b>	<b>388.63</b>